

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 COREY GERWASKI,

4 Plaintiff,

5 v.

6 STATE OF NEVADA, ex rel. BOARD
7 OF REGENTS of the NEVADA
8 SYSTEM OF HIGHER EDUCATION,
9 on behalf of the UNIVERSITY OF
10 NEVADA, LAS VEGAS; KEITH
11 WHITFIELD, individually; AJP
12 EDUCATIONAL FOUNDATION INC.,
13 a California Non-Profit Corporation;
14 STUDENTS FOR JUSTICE OF
15 PALESTINE-UNLV; NATIONAL
16 STUDENTS FOR JUSTICE OF
17 PALESTINE; NEVADANS FOR
18 PALESTINIAN LIBERATION;
19 DOES I-XX and ROE entities I-XX,
20 Defendants.

Case No. 2:24-cv-00985- APG-MDC

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
RESPONSE TO MOTION TO
DISMISS [ECF 37]**

21 IT IS HEREBY STIPULATED between Plaintiff COREY GERWASKI, and
22 Defendant AJP EDUCATIONAL FOUNDATION, INC., by and through their respective
23 counsel, regarding Defendant AJP EDUCATIONAL FOUNDATION, INC.'s SPECIAL
24 MOTION TO DISMISS PURSUANT TO NRS NEV. REV. STAT §41.660 [ECF 37]

25 1. On or about November 18, 2024, Defendants AJP EDUCATIONAL
26 FOUNDATION INC., filed their Motion to Dismiss under Nevada's anti-SLAPP statute.

27 2. Plaintiff was served with said Motion on the same day with a Response to
28 same due on December 2, 2024.

1 3. Counsel for Plaintiff was unavailable to commence response to this
2 Motion the week it was filed as a result of completing depositions throughout the week in
3 Northern Nevada.

4 4. Thereafter, the Thanksgiving Holiday and Counsel's scheduled oral
5 arguments in the Ninth Circuit Court of Appeals¹ thereafter provides good cause for
6 extending the briefing period herein.
7

8 5. Defendants' Counsel has graciously extended the briefing period for 30-
9 day as a professional courtesy and this stipulation follows with the briefing schedule to be
10 modified as to allow Plaintiff's Response to Defendant AJP Educational Foundation to be
11 due January 2, 2025.
12

13 6. As this case remains in its early stages, this short extension will not create
14 undue delay or burden any parties or the Court.

15 7. The additional time requested herein is not sought for the purposes of
16 delay, but merely to allow Plaintiff's Counsel adequate time to respond to the subject
17 Motion, taking into account the exercise of due diligence.
18

19 8. The Parties confirm that this stipulated first extension is not dilatory in
20 nature.
21

22 Dated this 25th day of November, 2024.

23 /s/ Sigal Chattah
24 SIGAL CHATTAH, ESQ.
25 5875 South Rainbow Blvd. #205
26 Las Vegas, NV 89118
27 (702) 360-6200
28 Counsel for Plaintiff
 Corey Gerwaski

¹ Plaintiff's Counsel is scheduled for oral argument in San Francisco on December 3, 2024 in *Doe v. Washoe County School District*, et al. 24-945 – 033.

1 /s/ Christina Jump

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3 Samira Elhosary (admitted pro
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9 /s Margaret A. McLetchie

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16 *Local Counsel for Defendant AJP*

Educational Foundation, Inc.

ORDER

IT IS THEREFORE ORDERED that Plaintiff COREY GERWASKI shall have up
and until January 2, 2025, to file a Response to Defendant's special motion to dismiss
pursuant to NRS 41.660. [ECF 37]

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE